

Susan Kumagai
Cal. Bar No. 127667
skumagai@lkclaw.com
Rebecca K. Kimura
Cal. Bar No. 220420
rkimura@lkclaw.com
LAFAYETTE & KUMAGAI LLP
100 Spear Street, Suite 600
San Francisco, California 94105
T: 415-357-4600 | F: 415- 357-4605

Stephen L. Scott (*pro hac vice*)
Ala. Bar No. ASB-7280-O62S
sls@kullmanlaw.com
F. Daniel Wood Jr. (*pro hac vice*)
Ala. Bar No. ASB-6822-D65F
fdw@kullmanlaw.com
THE KULLMAN FIRM
600 University Park Place, Suite 340
Birmingham, Alabama 35209
T: 205-871-5858 | F: 205-871-5874

Attorneys for Defendant, Computer Sciences Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FRED NAZIF, an individual,)	Case No. C13-05498 EMC
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER TO CONDUCT
v.)	DEPOSITIONS OUT OF TIME
)	
COMPUTER SCIENCES)	
CORPORATION, a Nevada Corporation,)	
and DOES 1-50, inclusive,)	
)	
Defendants.)	

COME NOW the parties in this action, Plaintiff Fred Nazif and Defendant Computer

Sciences Corporation, through their respective counsel, and hereby stipulate to taking the depositions of former CSC Technical Accountant April Hand and former GSS Controller Stephanie Mayes two and four days, respectively, beyond the cut-off for non-expert discovery and in support thereof say:

1. Whereas, April Hand and Stephanie Mayes are both under subpoena for depositions within the non-expert discovery period in this action.

2. Whereas, however, April Hand resides in Homer, Louisiana, which is currently experiencing severe winter weather and expected to experience additional severe winter weather, which will interfere with the current deposition setting. (For example, CSC's counsel's flight has already been canceled by the airline, and the witness reports that the courthouse and other businesses are closed due to dangerous travel conditions.)

3. Whereas, however, Stephanie Mayes' sister's death from cancer is imminent and the likely service arrangements will conflict with the current deposition setting.

4. Whereas, Ms. Hand has agreed to be deposed on March 11, 2015, Ms. Mayes has agreed to be deposed on March 13, 2015, and counsel for both parties also agree to these dates.

5. And Whereas, non-expert discovery closes in this matter on March 9, 2015, but taking these depositions out of time as described herein is not expected to otherwise disrupt the Scheduling Order for this case or its timely prosecution.

IT IS THEREFORE STIPULATED AND AGREED AS FOLLOWS: the depositions of April Hand and Stephanie Mayes may be taken out of time, as described herein.

In accordance with Northern District of California General Order 45, the filer of this document hereby attests that concurrence in the filing of this document has been obtained from the other signatory hereto.

IT IS SO STIPULATED:

DATED February 24, 2015

Le Clerc & Le Clerc LLP

By: /s/ Christopher R. LeClerc
Christopher R. LeClerc, Esq.

- 2 -

Attorney for Plaintiff, Fred Nazif

DATED February 24, 2015

The Kullman Firm

By: /s/ F. Daniel Wood Jr.
F. Daniel Wood Jr. (*pro hac vice*)

Attorneys for Defendant,
Computer Sciences Corporation

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATE: 2/24/15

